



Valley Two-Way, Inc.

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MAR 2 1993

PHONE 703 662-6867
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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Before the
Federal Communications Commission
Washington, D.C. 20554

MAR 2 1993

FCC - MAIL ROOM

In the Matter of

Replacement of Part 90
by Part 88 to Revise
the Private Land Mobile
Radio Services and Modify
the Policies Governing them

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) PR Docket 92-235
)
)
)

To: The Commission

COMMENT OF

Valley Two-Way, Inc. submits its comments in response to the Commission's Notice of Proposed Rule Making in this proceedings.

1. Valley Two-Way, Inc. opposes all three proposals.
2. Regarding the channel splitting proposal, the proposed 1996 date is far too early. Channel splitting should be postponed until the end of the year 1999, in order to give our company, as well as our thousands of customers, a reasonable opportunity to amortize our equipment and to give the manufacturers time to develop a full line of proven quality narrowband equipment. It has not been demonstrated that reliable communications are possible in such narrow channels. In addition, there should be only one equipment change, not two as the FCC now contemplates.
3. Regarding the power reduction plan, this plan is far too severe, and in most cases unnecessary. Adding more base stations or relays to maintain existing coverage does not make sense. Additional base stations and relays would add enormously to the costs of our systems. Furthermore, additional base stations will require additional sites

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which are scarce, costly, and environmentally troublesome. Land mobile licensees should have latitude to use adequate power to provide the needed coverage.

4. With respect to the consolidation of the land mobile services, this is by no means necessary, will be disruptive, and will deprive land mobile licensees the assurance that current services provided, will be available to them when needed.

Respectfully submitted,

Valley Two-Way, Inc.

By: Charles R. Gann

Title: President